

SEYFARTH SHAW LLP
Eric Lloyd (SBN 254390)
elloyd@seyfarth.com
Robin E. Devaux (SBN 233444)
rdevaux@seyfarth.com
Timothy M. Hoppe (SBN 310999)
thoppe@seyfarth.com
560 Mission Street, 31st Floor
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

Attorneys for Defendant
EXCELLIGENCE LEARNING CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JAHAN THISSEL,

Plaintiff,

v.

EXCELLIGENCE LEARNING CORP., a
Corporation doing business in the State of
California; and DOES 1 through 50,
inclusive,

Defendants

Case No. 19-cv-05421-SVK

**STIPULATION TO EXTEND TIME
FOR DEFENDANT TO RESPOND
TO SECOND AMENDED
COMPLAINT**

*[Filed concurrently with (1) Declaration
of Timothy Hoppe; and (2) [Proposed]
Order]*

Before Hon. Susan van Keulen
Complaint Filed: August 29, 2019
First Amended Complaint Filed:
November 27, 2019
Second Amended Complaint Filed: July
30, 2020

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Jahan Thissel and Defendant
2 Excelligence Learning Corporation (“Excelligence”), by and through their counsel, hereby
3 stipulate as follows:

4 1. On July 27, 2020, the Court granted in part and denied in part Excelligence’s
5 motion to dismiss Plaintiff’s First Amended Complaint, with leave to amend within 14 days.
6 The Court ordered that Excelligence’s responsive pleading would be due 14 days from the date
7 Plaintiff’s Second Amended Complaint was filed.

8 2. Plaintiff filed her Second Amended Complaint on July 30, 2020. Accordingly,
9 the current deadline for Excelligence to respond to Plaintiff’s Second Amended Complaint is
10 August 13, 2020.

11 3. To allow Excelligence adequate time to investigate and respond to the new
12 allegations raised in Plaintiff’s Second Amended Complaint, Plaintiff and Excelligence have
13 agreed to extend the time for Excelligence to respond to Plaintiff’s Second Amended Complaint
14 by two weeks, from August 13, 2020 to August 27, 2020.

15 4. This is Plaintiff and Excelligence’s first request for an extension of time for
16 Excelligence to file a response to the Second Amended Complaint.

17 5. This stipulated request will not affect any other date or deadline in this case.

18 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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1 DATED: August 11, 2020

LAW OFFICES OF JOHN F.
KLOPFENSTEIN

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4 By:

John F. Klopfenstein
Attorneys for Plaintiff
JAHAN THISSEL

5
6 DATED: August 11, 2020

SEYFARTH SHAW LLP

7
8
9 By:

Eric Lloyd
Robin E. Devaux
Timothy Hoppe
Attorneys for Defendant
EXCELLIGENCE LEARNING
CORPORATION

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Timothy Hoppe, attest that concurrence in the filing of this Stipulation has been obtained from the signatory, John F. Klopfenstein, counsel for Plaintiff.

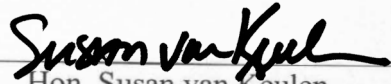
Executed this ____ day of August, 2020 in San Francisco, California.

By: /s/ Timothy Hoppe
Timothy Hoppe

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the deadline for Defendant Excelligence Learning Corporation to respond to Plaintiff Jahan Thissel's Second Amended Complaint is extended from August 13, 2020 to August 27, 2020.

DATED: August 12, 2020


Hon. Susan van Keulen
United States Magistrate Judge

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